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September 1, 2015

VIA ECF

Honorable Gregory H. Woods, U.S.D.J.
United States District Court
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Room 2260
New York, NY 10007

Re: Chau v. Hartford Life Ins. Co., 14 Civ. 8484 (S.D.N.Y. 2014) (GHW)

Dear Judge Woods:

I represent Plaintiff, Elizabeth Chau ("Chau"), in the above-referenced matter (the "Action").

I respectfully submit this letter, in accordance with Rules 1.A. & 1.E. of Your Honor's Individual Rules of Practice in Civil Cases, to request an extension of the deadline for Plaintiff to respond to two separate motions to dismiss ("MTD") filed in the Action. One was filed by Defendant, Howard Futerman, M.D. ("Futerman"); and, the other was filed by Defendants, Evelyn K. Balogun, M.D., David Hoenig, M.D., Dayton Dennis Payne, M.D., Reliable Review Services, Inc., Examworks Group, Inc. (collectively "EWG, et al.").

Pursuant to Rule 1.E., I respectfully request the extension, as follows:

- (1) Chau's current response date to the EWG, et al. MTD is September 10, 2015, and to the Futerman MTD is September 11, 2015. Response or reply by movants is due seven days after service of Chau's response.
- (2) There have been no previous requests for adjournment or extension of the time for Chau to respond to the MTDs.
- (3) The reason for the request is workload scheduling difficulties arising from deadlines in other matters.
- (4) All respective Counsel for movants on each MTD consent to this request.
- (5) The proposed date for Chau to respond to both MTDs is September 30, 2015.

Thank you for your consideration of this matter.

Respectfully submitted,

THE RANDO LAW FIRM P.C.

By: s/_____
Robert J. Rando (RR-5765)

RJR:lr

cc: Andrew I. Hamelsky, Esq., Counsel for Defendants, Evelyn K. Balogun, M.D.,
David Hoenig, M.D., Dayton Dennis Payne, M.D., Reliable Review Services,
Inc., Examworks Group, Inc. (via ECF)
Bryan F. Lewis, Esq., Counsel for Defendant, Howard Futerman, M.D. (via ECF)
Michael H. Bernstein, Esq., Counsel for Defendant, Hartford (via ECF)